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April 11, 2011

Sharon Abendschan, Enforcement Specialist
Technical Enforcement Program, BENF-RC
U. S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, Colorado 80202

**Re: CoCa Mines, Inc.; Congdon and Carey; Congdon and Carey Ltd 3;
Congdon and Carey Ltd 5; and Minerals Engineering Company**

**Gilt Edge Mine Superfund Site
Lawrence County, South Dakota ("Gilt Edge Site")**

**Nelson Tunnel/Commodore Waste Rock Superfund Site
Mineral County, Colorado ("Nelson Tunnel Site")**

**United States Environmental Protection Agency ("USEPA")
Request for Information Pursuant to CERCLA Section 104 ("RFI")
dated March 28, 2011**

Dear Ms. Abendschan:

The captioned RFI, addressed to my attention at "Travelers Property Casualty," was received on the afternoon of April 4, 2011. I am a member of the Special Liability Coverage Unit ("SLCU") of The Travelers Indemnity Company ("TIC") and its subsidiaries and affiliates; among the affiliated domestic property casualty insurance companies which currently utilize the trademark "Travelers" are TIC; Travelers Casualty and Surety Company, formerly known as The Aetna Casualty and Surety Company ("TCS"); The Standard Fire Insurance Company; St. Paul Fire and Marine Insurance Company ("St. Paul"); and their respective subsidiaries. The SLCU handles, on behalf of all of these "Travelers"-related companies, the investigation, analysis and determination of insurance coverage for certain matters arising out of long-term releases of pollutants into the environment, such as may have happened at the captioned Gilt Edge and Nelson Tunnel Sites. As a member of the SLCU, I will be your principal point of contact for the captioned RFI.

Please note that "Travelers Property Casualty" is an obsolete trade mark or trade name; the companies referenced in the preceding paragraph now generally refer to themselves as "Travelers." For the remainder of this letter I will use "Travelers" to refer to these currently-related insurers, individually or collectively as is appropriate.

Please also note that one of the insurance companies referenced in the RFI, "Travelers Insurance Company," is no longer affiliated with Travelers, but is now known as Metlife Insurance Company of Connecticut. However, the non-life (i.e., property casualty) insurance obligations of the former "Travelers Insurance Company," if any, have been assumed by TIC.

In addition, please note that several other insurance companies referenced in the RFI are not and have never been affiliated with any of the Travelers-related companies. These unrelated insurers are: Commercial Union Insurance Company; American Employers Insurance Company; Employers Fire Insurance Company; and Northern Assurance Company of America. My understanding is that these companies are related to One Beacon Insurance.

I will be searching the records of all of the current Travelers-affiliated domestic property casualty insurance companies for copies of liability insurance policies issued to CoCa Mines, Inc., the 3 captioned "Congdon and Carey"-related entities, and Minerals Engineering Company. The insurance companies whose records will be searched include: TIC and its subsidiaries (among which are the former Gulf Insurance Group, the former Phoenix of Hartford, the former Constitution State Insurance Company, American Equity Insurance Company, Northland Insurance Company, and their subsidiaries); TCS and its subsidiaries; The Standard Fire Insurance Company and its subsidiaries; and St. Paul and its subsidiaries (among which are United States Fidelity and Guaranty Insurance Company and its subsidiaries). These many different entities have joined the Travelers family of insurance companies at different points in time over a more than 40-year period, and each had different record-keeping systems and archival practices prior to (and usually for some period subsequent to) their integration with the other Travelers companies. To this day, many of the sources of historical policy information for these formerly separate and unaffiliated insurers remain unintegrated with Travelers current business systems. Therefore, a thorough historical policy search, for all of the captioned names under all of these potential insurers, is complex and time consuming.

Accordingly, I am requesting an extension of time, until at least 60 days after the SLCU's receipt of the RFI (i.e., until June 3, 2011) for policy research to be completed.

Please note that Travelers takes very seriously the privacy and confidentiality concerns of its policyholders, and does not routinely release information about them (including copies of their insurance policies) to unrelated third parties without their knowledge and consent. Accordingly, to the extent that we locate copies of potentially relevant insurance policies, I will be contacting the policyholder(s) to inform them of USEPA's RFI and to request their consent to release copies of their insurance policies to USEPA.

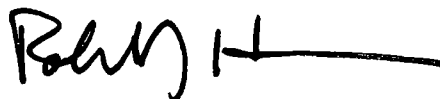
Sharon Abendschan

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Please let me know your thoughts regarding our request for an extension of time, and please feel free to contact me with any other questions you may have regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert H." followed by a long horizontal line.

RJH3082